Remarks

By this amendment, amendments have been made to Claims 30 and 45. Support for these amendments can be found, e.g., in the original application at pages 6-7 and 11 (paragraphs [0021], [0022] and [0037], respectively, from the publication of the subject application, U.S. Patent Application Publication No. 2006/0179303 A1). Claims 30 – 58 remain pending in the application. For reasons as stated below, Applicants submit that the application in its present form overcomes all prior rejections and is in condition for allowance. Applicants will address the specific rejections below.

Claim Rejections – 35 USC 102

Claims 30, 34, 36 – 45, 49, and 51- 58 have been rejected under 35 USC 102(e) as being anticipated by Elson et al. (U.S. Patent Application Publication No. 2003/0014521) ("Elson"). This rejection is respectfully traversed, although independent claims 30 and 45 have been amended to clarify certain distinctions between the claimed invention and the reference.

As opposed to prior art networks (e.g. Bluetooth networks) between wireless devices, the present invention allows the "imprinting" of domain member devices by the sharing of a group key (i.e., security data) and identities of the other domain member devices. (*See, e.g.*, pages 20-21 of the original application, and specifically paragraphs [0077] and [0078] of the publication of the subject application, U.S. Patent Application Publication No. 2006/0179303 A1). Any domain member device can use the group key and the identity of any other domain member device to establish a bilateral, secure

communication to that device without the need to refer to an administrator. Advantageously, the sharing of the group key and identities of the other domain name member devices is a "one-time" distribution for each new device added to a domain. Further, an administrator means is located on one of the domain member devices, and is transferable to another domain member device "at the whim" of a user.

Independent claim 30, as amended, is directed to a network including a plurality of devices capable of wireless communication with each other, the network including, *inter alia*, "a device having administration means for allowing selected devices to be associated within a domain including at least three of said devices by providing each device in the domain with identification data, the identification data including security data for identifying each device as a member of the domain and device identity data corresponding to each member of the domain, said device identity data being required to allow each device in the domain to establish secure communications directly with each other device within the domain."

Elson is directed to an in-vehicle telematics network with a "throw-away" extension to other networks (paragraph [0077]), where one device is permanently the "administrator," with all requests for access to other networked devices needing to be directed through the administrator, in essentially a hub-and-spoke arrangement.

It is alleged in the Office Action that Elson teaches "a network including administration means (i.e., controlling access module) for allowing selected devices to be associated within a domain including at least three of said devices by providing each device with identification data (claim 1; lines 24 – 28)."

It is respectfully submitted that Elson does not anywhere in the reference explicitly disclose a "controlling access module," as alleged. The only "modules" referred to in the specification are a kernel module and an FUSD (framework for user space devices) module. While the FUSD module "provides access to all drivers and most system resources" (paragraph [0077], lines 5 – 9), Elson does not teach or even remotely suggest the "FUSD module," or any other component that could potentially be read as the "administration means" of amended claim 30, "providing each device in the domain with identification data, the identification data including security data for identifying each device as a member of the domain and device identity data corresponding to each member of the domain, said device identity data being required to allow each device in the domain to establish secure communications directly with each other device within the domain," as recited therein.

Claim 1, lines 24 – 28 of Elson state, "generating schedules for granting access to the requested resources, wherein the schedules are generated by the generating resource management module in response to the resource status information." No disclosure is provided that teaches anything other than a conventional signal-intensive hub and spoke communication configuration.

Thus, it is respectfully submitted that Elson fails to teach or suggest the aforementioned features of amended claim 30.

Independent claim 45, as amended, is directed to a method allowing selected devices within a network to be associated within a domain that includes at least three of said devices, the method including, *inter alia*, "adapting one device within the domain to

provide each other device in the domain with identification data, the identification data including security data for identifying each device as a member of the domain and device identity data corresponding to each member of the domain, said device identity data being required to allow each device in the domain to establish secure communications directly with each other device within the domain."

It is alleged in the Office Action that Elson teaches a "method including adapting (e.g., establishing) one device (e.g., PDA) within the domain (e.g., network) to provide each other device with identification data [i.e., unique ID] (i.e., Elson teaches a PDA establishing it's credential with the network [par. 227, line 5 – 6]. Elson teaches access authentication to resource within the network is control buy [sic.] using a unique ID. Elson teaches the assigning of the unique ID [par. 223]), the identification data (i.e., packet) of each device being interpretable (i.e., recognize and authenticate) by each other device within the domain (par. 231, lines 14 – 19)."

It is respectfully submitted that the disclosure of "a PDA establishing its credentials with a network" does not equate to adapting the PDA (read as "device") to provide each other device in the domain with identification data, as "identification data" is defined in amended claim 45.

Further, as discussed above with respect to claim 30, it is respectfully submitted that Elson does not teach or even remotely suggest "providing each other device in the domain with identification data, the identification data including security data for identifying each device as a member of the domain and device identity data corresponding to each member of the domain, said device identity data being required to

allow each device in the domain to establish secure communications directly with each other device within the domain."

Thus, it is respectfully submitted that Elson fails to teach or suggest the aforementioned features of amended claim 45.

Claims 34, and 36 – 44 depend from amended claim 30, and claims 49, and 51- 58 depend from amended claim 45. Therefore, claims 34, 36 – 44, 49, and 51- 58 are allowable for at least the reasons provided in support of allowability of amended claims 30 and 45.

Claim Rejections – 35 USC 103

Claims 31 – 33, 35, 46 – 48 and 50 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Elson in view of Morgan (U.S. Patent Application Publication No. 2003/0204738. This rejection is respectfully traversed.

It is respectfully submitted that Morgan does not add anything that would remedy the aforementioned deficiencies of Elson. Accordingly, favorable reconsideration and withdrawal of the rejection of claims 31 – 33, 35, 46 – 48 and 50 is respectfully requested.

In view of the foregoing, Applicants submit that the present application overcomes all prior rejections and has been placed in condition for allowance. Such action is respectfully requested.

Respectfully submitted,

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